

FILED  
SEP 27 2017

U. S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUIS

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

DENNIS M. SUELLENTROP, JR.,

Defendant.

No

**4:17CR00435 CDP/JMB**

**INDICTMENT**

**COUNT I**

The Grand Jury charges that:

At all times pertinent to the charges in this indictment:

1. Federal law defined the term:

- (a) "minor" to mean any person under the age of eighteen years (18 U.S.C. § 2256(a));
- (b) "sexually explicit conduct" to mean actual or simulated
  - (i) sexual intercourse, including genital-genital, oral-genital, anal-genital, or oral-anal, whether between persons of the same or opposite sex,
  - (ii) bestiality,
  - (iii) masturbation,
  - (iv) sadistic or masochistic abuse, or

(v) lascivious exhibition of the genitals or pubic area of any person (18 U.S.C. §2256(2)(A)); and

(c) "computer" to mean an electronic, magnetic, optical, electrochemical or other high speed data processing device performing logical, arithmetic or storage functions, including any data storage facility or communications facility directly related to or operating in conjunction with such device. (18 U.S.C. §2256(6)).

(d) "child pornography" to mean any visual depiction, including any photograph, film, video, picture, or computer or computer-generated image or picture, whether made or produced by electronic, mechanical, or other means, of sexually explicit conduct, where--

(A) the production of such visual depiction involves the use of a minor engaging in sexually explicit conduct; or

(C) such visual depiction has been created, adapted, or modified to appear that an identifiable minor is engaging in sexually explicit conduct.

2. The "Internet" was, and is, a computer communications network using interstate and foreign telephone lines to transmit data streams, including data streams used to store, transfer and receive graphic files.

3. Between on or about August 19, 2016, and on or about August 20, 2016, in the Eastern District of Missouri, and elsewhere,

**DENNIS M. SUELLENTROP, JR.,**

the defendant herein, did knowingly employ, use, persuade, induce, entice, and coerce an infant, a prepubescent minor female, to engage in sexually explicit conduct, specifically, defendant video recorded the infant in a lascivious display of her genitals, including video recording her as he forcibly squeezed her vagina, forced his tongue into her anus, licked her anus, forced his tongue into her vagina, and put his tongue in her mouth, and said sexually explicit conduct was for the purpose of producing visual depictions of such conduct, and such depictions were produced using materials that had been mailed, shipped, or transported in interstate and foreign commerce, i.e., an LG Electronics Cell phone and a MicroSD card,

In violation of Title 18, United States Code, Section 2251(a) and punishable under Title 18, United States Code, Section 2251(e).

## **COUNT II**

The Grand Jury further charges that:

1. The allegations contained in paragraphs one and two of Count I of this Indictment are incorporated by reference as if fully set forth herein.

2. On or about August 21, 2016, in the Eastern District of Missouri, and elsewhere,

### **DENNIS M. SUELLENTROP, JR.,**

the defendant herein, did knowingly employ, use, persuade, induce, entice, and coerce an infant, a prepubescent minor female, to engage in sexually explicit conduct, specifically, defendant video recorded the infant in a lascivious display of her genitals, including video recording her as he forced his tongue into her anus and vagina, and forcibly spreads her vagina, and said sexually explicit conduct was for the purpose of producing visual depictions of such conduct, and such depictions were produced using materials that had been mailed, shipped, or transported in interstate and foreign commerce, i.e., an LG Electronics Cell phone and a MicroSD card,

In violation of Title 18, United States Code, Section 2251(a) and punishable under Title 18, United States Code, Section 2251(e).

**COUNT III**

The Grand Jury further charges that:

1. The allegations contained in paragraphs one and two of Count I of this Indictment are incorporated by reference as if fully set forth herein.

2. On or about August 31, 2016, in the Eastern District of Missouri, and elsewhere,

**DENNIS M. SUELLENTROP, JR.,**

the defendant herein, did knowingly employ, use, persuade, induce, entice, and coerce an infant, a prepubescent minor female, to engage in sexually explicit conduct, specifically, defendant video recorded the infant in a lascivious display of her genitals, including video recording her as he licked her vagina, anus, and face; forcibly pulls her back as she tries to move away from him; and forcibly holds her thighs as he rubbed his penis on her vagina and anus until he ejaculated on her, and said sexually explicit conduct was for the purpose of producing visual depictions of such conduct, and such depictions were produced using materials that had been mailed, shipped, or transported in interstate and foreign commerce, i.e., an LG Electronics Cell phone and a MicroSD card,

In violation of Title 18, United States Code, Section 2251(a) and punishable under Title 18, United States Code, Section 2251(e).

**COUNT IV**

The Grand Jury further charges that:

1. The allegations contained in paragraphs one and two of Count I of this Indictment are incorporated by reference as if fully set forth herein.

2. On or about September 8, 2016, in the Eastern District of Missouri, and elsewhere,

**DENNIS M. SUELLENTROP, JR.,**

the defendant herein, did knowingly employ, use, persuade, induce, entice, and coerce an infant, a prepubescent minor female, to engage in sexually explicit conduct, specifically, defendant video recorded the infant in a lascivious display of her genitals, including video recording her as he forced his tongue into her anus, and inserted his finger into her anus, and said sexually explicit conduct was for the purpose of producing visual depictions of such conduct, and such depictions were produced using materials that had been mailed, shipped, or transported in interstate and foreign commerce, i.e., an LG Electronics Cell phone and a MicroSD card, In violation of Title 18, United States Code, Section 2251(a) and punishable under Title 18, United States Code, Section 2251(e).

**COUNT V**

The Grand Jury further charges that:

1. The allegations contained in paragraphs one and two of Count I of this Indictment are incorporated by reference as if fully set forth herein.

2. On or about September 9, 2016, in the Eastern District of Missouri, and elsewhere,

**DENNIS M. SUELLENTROP, JR.,**

the defendant herein, did knowingly employ, use, persuade, induce, entice, and coerce an infant, a prepubescent minor female, to engage in sexually explicit conduct, specifically, defendant video recorded the infant in a lascivious display of her genitals, including video recording her as he forcibly spread her buttocks apart and inserted his tongue into her vagina and anus, and said

sexually explicit conduct was for the purpose of producing visual depictions of such conduct, and such depictions were produced using materials that had been mailed, shipped, or transported in interstate and foreign commerce, i.e., an LG Electronics Cell phone and a MicroSD card,

In violation of Title 18, United States Code, Section 2251(a) and punishable under Title 18, United States Code, Section 2251(e).

#### **COUNT VI**

The Grand Jury further charges that:

1. The allegations contained in paragraphs one and two of Count I of this Indictment are incorporated by reference as if fully set forth herein.

2. On or about September 17, 2016, in the Eastern District of Missouri, and elsewhere,

#### **DENNIS M. SUELLENTROP, JR.,**

the defendant herein, did knowingly employ, use, persuade, induce, entice, and coerce an infant, a prepubescent minor female, to engage in sexually explicit conduct, specifically, defendant video recorded the infant in a lascivious display of her genitals, including video recording her as rubbed his penis on her feet, and said sexually explicit conduct was for the purpose of producing visual depictions of such conduct, and such depictions were produced using materials that had been mailed, shipped, or transported in interstate and foreign commerce, i.e., an LG Electronics Cell phone and a MicroSD card,

In violation of Title 18, United States Code, Section 2251(a) and punishable under Title 18, United States Code, Section 2251(e).

#### **COUNT VII**

The Grand Jury further charges that:

1. The allegations contained in paragraphs one and two of Count I of this Indictment are incorporated by reference as if fully set forth herein.

2. Between on or about December 28, 2016, to on or about December 29, 2016, in the Eastern District of Missouri, and elsewhere,

**DENNIS M. SUELLENTROP, JR.,**

the defendant herein, did knowingly employ, use, persuade, induce, entice, and coerce an infant, a prepubescent minor female, to engage in sexually explicit conduct, specifically, defendant video recorded the infant in a lascivious display of her genitals, including video recording her as forcibly spread her buttocks apart, rubbed his penis on her buttocks and vagina, and inserted his penis into her mouth, and said sexually explicit conduct was for the purpose of producing visual depictions of such conduct, and such depictions were produced using materials that had been mailed, shipped, or transported in interstate and foreign commerce, i.e., an LG Electronics Cell phone and a MicroSD card,

In violation of Title 18, United States Code, Section 2251(a) and punishable under Title 18, United States Code, Section 2251(e).

**COUNT VIII**

The Grand Jury further charges that:

1. The allegations contained in paragraphs one and two of Count I of this Indictment are incorporated by reference as if fully set forth herein.

2. Between on or about December 30, 2016, to on or about January 1, 2017, in the Eastern District of Missouri, and elsewhere,

**DENNIS M. SUELLENTROP, JR.,**



the defendant herein, did knowingly possess material that contained an image of child pornography that was produced using materials that traveled in interstate and foreign commerce, to wit, an LG Electronics Cell phone and a MicroSD card having been produced outside Missouri and therefore having traveled in interstate and foreign commerce, and said LG Electronics Cell phone and MicroSD card contained child pornography, including but not limited to, the following:

- a. “2016-09-13\_11-08-06.jpg,” a graphic image file that depicts a picture of a penis superimposed on the mouth of a minor female;
- b. “2016-09-13\_11-12-44.jpg” a graphic image file that depicts a picture of a penis superimposed on the mouth of a minor female;
- c. “20161108 131630-ANIMATION.gif, a graphic image file of a penis superimposed on the mouth of a prepubescent minor female;

In violation of Title 18, United States Code, Section 2252A(a)(5)(B).

A TRUE BILL.

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FOREPERSON

CARRIE COSTANTIN  
Acting United States Attorney

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ROBERT F. LIVERGOOD, #35432MO  
Assistant United States Attorney